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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CAPITOL SPECIALTY INSURANCE
CORPORATION,

Plaintiff,

vs.

STEADFAST INSURANCE COMPANY, et
al.,

Defendants(s).

CASE NO.: 2:20-cv-01382-JAD-VCF

CONSOLIDATE WITH:

CASE NO.: 3:22-CV-3550MMD-CLB

**STIPULATION AND PROPOSED ORDER
TO EXTEND EXPERT DISCLOSURE
DEADLINES ONLY**

(FIRST REQUEST)

STEADFAST INSURANCE COMPANY,

Plaintiff,

vs.

RAY HEATING PRODUCTS, INC., et al.,

Defendant(s).

STEADFAST INSURANCE COMPANY, et
al.,

Cross-Claimant

vs.

RHP MECHANICAL SYSTEMS, INC.

Cross-Defendant

IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys of record, that **the current expert discovery deadlines only to be extended approximately one (1) week**, pursuant to Local Rule 26-1(b).

I.

DISCOVERY COMPLETED TO DATE

1. The parties have conducted the FRCP 26.1 Early Case Conference.
2. The parties have produced their respective Lists of Witnesses and Documents, and supplements thereto pursuant to FRCP 26(a).
3. Plaintiff has propounded discovery to Defendants/Cross-Defendants RHP Mechanical Systems and Ray Heating Products, Inc.
4. Defendants/Cross-Defendants RHP Mechanical Systems and Ray Heating Products, Inc. have responded to Plaintiff's discovery.
5. Deposition of Defendants/Cross-Defendants RHP Mechanical Systems and Ray Heating Products, Inc.'s PMK.
6. Defendants/Cross-Defendants RHP Mechanical Systems and Ray Heating Products, Inc. have produced their job file material.
6. Plaintiff has disclosed experts.

II.

DISCOVERY THAT REMAINS TO BE COMPLETED

1. Defendants/Cross-Defendants RHP Mechanical Systems and Ray Heating Products, Inc.'s Designation of Experts.
2. Rebuttal expert disclosures.
3. Depositions of experts.
4. Additional written discovery (if necessary).
5. Any remaining discovery the parties deem relevant and necessary as discovery continues.

III.

REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY DEADLINES

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the following requested extension. Counsel for Defendants/Cross-Defendants RHP Mechanical Systems and Ray Heating Products, Inc. unfortunately had a death in her family and had to travel out of state for the funeral.

Extension or Modification of The Discovery Plan and Scheduling Order.

LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3. If the stipulation is made less than twenty-one (21) days before the expiration of a deadline, the parties must demonstrate the same was the result of excusable neglect. LR 26-3. This is the first request for an extension of time in this matter.

Discovery Deadline	Current Deadline	Proposed Deadline
Motion to Amend/Add Parties	April 18, 2023	April 18, 2023
Plaintiff's Initial Expert Disclosures	September 22, 2023	September 29, 2023
All Rebuttal Expert Disclosures	October 27, 2023	November 3, 2023
Discovery Cut-Off Date	December 1, 2023	December 8, 2023
Dispositive Motions	January 5, 2024	January 12, 2024

Joint Pretrial Order February 13, 2024

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

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The parties represent this Stipulation is sought in good faith and not interposed for delay or any other improper purpose.

Dated this 22nd day of September, 2023.

Dated this 22nd day of September, 2023.

MORALES FIERRO & REEVES

TYSON & MENDES LLP

/s/ William C. Reeves

/s/ Thomas McGrath

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED this 9-25-2023 _____